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TO: MAIL STOP APPEAL BRIEF - PATENTS

Examiner Fadok, Mark A.

FAX NO: 1-571-273-8300

FROM: Gero G. McClellan / David Magness

PAGE(S) with cover: 22

RE:
TITLE: **Process for Data Driven Application Integration for B2B**
U.S. SERIAL NO.: 09/837,041
FILING DATE: **April 18, 2001**
INVENTOR(S): **O'Brien et al.**
EXAMINER: **Fadok, Mark A.**
GROUP ART UNIT: **3625**
CONFIRMATION NO.: **9205**

Attached for the above-referenced application please find:

　　1.　Appeal Brief

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Atty. Dkt. No. ROC920000304US1
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:
    O'Brien et al.
 	
Serial No.: 09/837,041
 	
Confirmation No.: 9205
 	
Filed: April 18, 2001
 	
For: Process for Data Driven
       Application Integration for B2B
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Group Art Unit: 3625

Examiner: Fadok, Mark A.

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

APPEAL BRIEF

Applicants submit this Appeal Brief to the Board of Patent Appeals and Interferences on appeal from the decision of the Examiner of Group Art Unit 3625 dated July 7, 2005, finally rejecting claims 1, 3, 4 and 8-12. The final rejection of claims 1, 3, 4 and 8-12 is appealed. This Appeal Brief is believed to be timely since facsimile transmitted by the due date of January 7, 2006, as set by mailing a Notice of Appeal on November 7, 2005. Please charge the fee of $500.00 for filing this brief to Deposit Account No. 09-0465/ROC920000304US1.

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Real Party In Interest

The present application has been assigned to International Business Machines Corporation, Armonk, New York.

Related Appeals and Interferences

Applicant asserts that no other appeals or interferences are known to the Applicant, the Applicant's legal representative, or assignee which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

Status of Claims

Claims 1 and 3-17 are pending in the application. Claims 1-38 were originally presented in the application. Claims 5-7 and 13-17 have been withdrawn without prejudice. Claims 1, 3, 4 and 8-12 stand finally rejected as discussed below. The final rejections of claims 1, 3, 4 and 8-12 are appealed. The pending claims are shown in the attached Claims Appendix.

Status of Amendments

All claim amendments have been entered by the Examiner. No amendments to the claims were proposed after the final rejection.

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Summary of Claimed Subject Matter

Claimed embodiments of the invention (*See, e.g.,* Claim 1) provide a system for handling eCommerce requests. *See, e.g.,* Pg. 3, Para. 0044; Fig. 3, Items 300, 302, 304, 306. The system includes at least one application configured to process a request in a transformed format (*See, e.g.,* Pg. 4, Para. 0051, 0053-0054; Fig. 4, Item 412), wherein the request is received from one of a plurality of requesting entities in an original format and mapped to the transformed format (*See, e.g.,* Pg. 4, Para. 0051; Fig. 4, Items 408, 422). The system also includes at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format (*See, e.g.,* Pg. 7, Para. 0070-0071; Pg. 11, Para. 0094; Fig. 4, Items 415, 420, 418, 416, 422; 413A), wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol (*See, e.g.,* Pg. 4, Para. 0047, 0051; Pg. 11, Para. 0093-0094; Fig. 4, Items 302, 304, 408, 422; Fig. 7, Item 700). The system further includes a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format and to call the at least one application. (*See, e.g.,* Pg. 4, Para. 0051; Pg. 5, Para. 0059; Fig. 4, Item 408).

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Grounds of Rejection to be Reviewed on Appeal

Claims 1, 3, 4 and 8-12 stand rejected under 35 U.S.C. 102(e) as being anticipated by *Meltzer et al.* (U.S. Pat. No. 6,125,391, hereinafter *Meltzer*).

ARGUMENTS

Anticipation of claims 1, 3, 4 and 8-12 by *Meltzer*.

The Applicable Law

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, In a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

The Examiner's Argument

The Examiner states that *Meltzer* discloses a system for handling eCommerce requests, comprising: (a) at least one application configured to process a request in a transformed format at Figure 4, and wherein the request is received from one of a plurality of requesting entities in an original format and mapped to the transformed format at Figure 9. *See Final Office Action dated July 7, 2005* (hereinafter *Final Office Action*), Pg. 3, Para. 4 to Pg. 4, Para. 1. The Examiner also states that *Meltzer* teaches (b) at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format at Figure 9, and wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol at Col. 32, Lines 12-55. *Final Office Action*, Pg. 4, Para. 2. The Examiner further states that *Meltzer* teaches (c) a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format and to call the at least one application at Figure 13. *Final Office Action*, Pg. 4, Para. 3.

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The Cited Reference

Meltzer discloses a business interface definition (BID) which is posted on the Internet and describes to potential trading partners the services a company offers and the documents to use when communicating with such services. *See Meltzer, Abstract.*

Figure 4, cited by the Examiner, illustrates a process of receiving and processing an incoming document for the system of *Meltzer. See Meltzer,* Col. 26, Lines 18-19. When the document is received, the document type is identified (Item 401), the document is parsed (Item 402), and the document is translated to the format of the host (Item 403). *See Meltzer,* Figure 4, Items 401, 402, 403; Col. 26, Lines 18-29. The document is then passed to a host transaction front end (Item 404) and processes which receive elements of the document are executed and produce an output (Item 405). *See Meltzer,* Figure 4, Items 404, 405; Col. 26, Lines 18-29.

Figure 9, cited by the Examiner, illustrates the process of building a BID. *See Meltzer,* Figure 9; Col. 30, Lines 31-32. As part of the process depicted in Figure 9, translators are created for document to host mappings using a compiler. *See Meltzer,* Figure 9, Item 905; Col. 30, Lines 45-47; Col. 25, Lines 34-39.

Col. 32, Lines 12-55, cited by the Examiner, describe the Common Business Library (CBL) which is used to design applications. *See Meltzer,* Col. 31, Lines 35-40; Col. 32, Lines 3-4. The CBL creates a source from which almost all of the pieces of a system can be generated by a compiler. *See Meltzer,* Col. 32, lines 12-14.

Figure 13, cited by the Examiner, illustrates the process of registering participants at a market maker node in *Meltzer. See Meltzer,* Figure 13; Col. 8, Lines 62-64. A market participant document is accepted at a network interface (Item 1300), stored (Item 1301), parsed (Item 1302), and translated into the format of the host (Item 1303). *See Meltzer,* Figure 13, Items 1300-1303; Col. 83, Lines 45-67. After the document is translated, the document is passed to a router service (Item 1304) which includes a listener which identifies the registration service as the destination of the document (Item 1305). *See Meltzer,* Figure 13, Items 1304-1305; Col. 83, Lines 45-67.

Applicants' Response to the Examiner's Argument

In this case, *Meltzer* does not disclose "each and every element as set forth in the claim". For example, *Meltzer* does not disclose "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol". The Examiner argues that *Meltzer* discloses "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" in Figure 9 and "metadata compris[ing] a plurality of metadata instances each configured to support a different request protocol" at Col. 32, Lines 12-55. *Final Office Action*, Pg. 4, Paras. 1-2.

The Examiner appears to suggest that the BID built by the process in Figure 9 (*See Meltzer*, Col. 30, Line 31) corresponds to the claimed "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" and that Common Business Library (CBL) modules and Schema document type definitions (DTDs) in the cited section (*See Meltzer*, Col. 32, Lines 12-55) correspond to the produced "metadata compris[ing] a plurality of metadata instances each configured to support a different request protocol".

However, Applicants submit that the cited CBL modules and DTDs are not "metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" because the CBL modules and DTDs do not describe a "request in a transformed format" and furthermore, the cited section of *Meltzer* does not describe that the BID is "configured to produce" the cited CBL modules and DTDs. *See Meltzer*, Col. 32, Lines 12-55.

The section cited by Examiner shows a Schema DTD (*Meltzer*, Col. 32, Lines 45-55) as well as an instance of a "datetime" module (*Meltzer*, Col. 32, Lines 25-35) defined by the Schema. Both the depicted Schema and the "datetime" module are stored in the CBL repository. *Meltzer*, Col. 32, Lines 12-5. The CBL repository consists

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of *information models* for generic business concepts including business description primitives like companies, services, and products; business forms like catalogs, purchase orders, and invoices; and standard measurements, date and time, location, and classification codes. *Meltzer,* Col. 31, Lines 41-58. The DTD is the formal specification or grammar for *documents of a given type;* it describes the elements, their attributes, and the order in which they must appear. *Meltzer,* Col. 31, Lines 26-28.

As evidenced by the emphasized words ("information models" and "documents of a given type"), the cited documents merely describe business documents (*e.g.,* forms). The business documents specify appropriate documents which may be used in a system such as that of *Meltzer.* Thus, the documents in the cited section do not describe "metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" because the cited section and documents do not relate to "a request in a transformed format".

Furthermore, as stated above, both the depicted Schema and the "datetime" module are stored in the CBL repository. *Meltzer,* Col. 32, Lines 12-5. The CBL repository is a common library used by developers to implement industry messaging standards and conventions (thus, the name, "Common Business Library"). *See Meltzer,* Col. 31, Lines 41-55. Thus, the contents of the CBL, cited by the Examiner, are in no way produced from the BID. *See id.* Accordingly, the cited sections do not describe "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol."

Meltzer also fails to disclose a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format and to call the at least one application. As claimed, the metadata defines a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol. The Examiner appears to suggest that a flow manager configured to utilize the metadata to map the request in the

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original format to the request in the transformed format and to call the at least one application is described in Figure 13. *Final Office Action,* Pg. 4, Para. 3. Applicant notes that the Examiner has not particularly identified any specific item in Figure 13 as a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format and to call the at least one application. *Final Office Action,* Pg. 4, Para. 3. However, Applicant presumes that the Examiner believes that translating the market participant document (Item 1303) and passing the document to the router service (Item 1304) corresponds to a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format and to call the at least one application is described in Figure 13.

Applicants respectfully submit that the Examiner's rejection errs in at least two respects. First, the translation described in *Meltzer* is performed using a compiled translator. *See Meltzer,* Figure 4, Item 403; Figure 9, Item 905; Col. 26, Lines 25-30; Col. 30, Lines 45-47; Col. 25, Lines 34-39. *Meltzer* does not describe that the translator utilizes "metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol" to perform such translation. *See id.* Thus, *Meltzer* does not describe "a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format".

Second, the translator in *Meltzer* does not call an application. Instead, the documents, after translation from XML logic structures into JAVA objects, are routed to processes in response to the events indicated by a parser and the translator. *See Meltzer,* Col. 26, Lines 25-33. An event listener listens for the event object. *See Meltzer,* Col. 26, Lines 50-51. The listener then handles the event object. *See Meltzer,* Col. 25, Lines 63-64. Applicants submit that passing JAVA objects as events to a listener is not calling an application because the listener is already being executed when the JAVA object is received and treated as an event. *See Meltzer,* Col. 26, Lines 50-51; Col. 25, Lines 63-64. Thus, *Meltzer* does not describe "a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format".

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Withdrawal of the rejection is respectfully requested.

Examiner's Response to Applicants' Arguments

In the Examiner's *Final Office Action*, Examiner provides a response to Applicants' arguments. *See Final Office Action*, Pg. 6, Paras. 1-3.

In response to Applicants' argument that *Meltzer* does not teach "at least one specification document configured to produce meta data defining a relationship between data of the request in the original format and data of the request in the transformed format," the Examiner directs the Applicants' attention to *Meltzer* at Fig. 15 item 1506, "which [the Examiner argues] shows the relationship between the host and source through a mapping process *See id.* Item 1506 in Figure 15 depicts a translation table.

First, Applicants note that the cited translation table 1506 is not "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol." Instead, the translation table "is used to support the translation from non-XML form into XML form." *Meltzer*, Col. 84, Lines 32-33.

The Examiner does not specifically state which portion of "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol" the cited translation table 1506 is supposed to disclose. *See Final Office Action*, Pg. 6, Paras. 1-3. If Examiner is suggesting that the translation table is the "at least one specification document" described in Applicants' claim, then the cited section does not describe that the translation table 1506 "is configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format." If Examiner is suggesting that the translation table 1506 is

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"metadata defining a relationship between data of the request in the original format and data of the request in the transformed format," then the cited section does not describe "at least one specification document configured to produce" the translation table 1506. Accordingly, the cited portion of *Meltzer* does not describe "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol."

Withdrawal of the rejection is respectfully requested.

CONCLUSION

The Examiner errs in finding that claims 1, 3, 4 and 8-12 are anticipated by *Meltzer* under 35 U.5.C. 102(e). Withdrawal of the rejection and allowance of all claims is respectfully requested.

Respectfully submitted and S-signed pursuant to 37 CFR 1.4,

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CLAIMS APPENDIX

1.   (Previously Presented)   A system for handling eCommerce requests, comprising:

(a)   at least one application configured to process a request in a transformed format, wherein the request is received from one of a plurality of requesting entities in an original format and mapped to the transformed format;

(b)   at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol; and

(c)   a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format and to call the at least one application.

2.   (Canceled)

3.   (Original)   The system of claim 1, wherein the data of the request in the original format comprises fields and wherein the metadata maps the fields to input fields of the at least one application.

4.   (Original)   The system of claim 1, wherein the request is a purchase order and the data comprises fields of the purchase order.

5.   (Withdrawn) The system of claim 1, further comprising a front-end gateway in communication with the flow manager via a transport mechanism and configured to receive requests from the plurality of requesting entities.

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6.   (Withdrawn) The system of claim 5, wherein the front-end gateway is configured to translate the request into a protocol understandable by the flow manager.

7.   (Withdrawn) The system of claim 6, wherein the protocol understandable to the flow manager is XML.

8.   (Previously Presented)   The system of claim 1, wherein the original format comprises at least one of cXML, mXML, xCBL, OCI, and ebXML.

9.   (Original)   The system of claim 1, wherein the at least one specification document comprises at least one of:

message formatting rules comprising definitional data and configured to define an association between the definitional data and the data of the request in the original format;

    an access method configured to define an interface to the at least one application; and

    a process flow model configured to associate the message formatting rules and the access method instance and comprising mapping rules configured to map input fields of the request in the original format to input fields of the at least one application.

10.   (Original)   The system of claim 9, wherein the association is between a first plurality of fields of the definitional data and a second plurality of fields of the data of the request in the original format.

11.   (Original)   The system of claim 9, wherein each access method is configured to support applications of a particular application type.

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12.   (Original)   The system of claim 11, wherein the particular application type comprises at least one of program calls, JAVA programs, and queue applications.

13.   (Withdrawn) The system of claim 1, wherein the at least one specification document comprises:

message formatting rules comprising definitional data and configured to define an association between the definitional data and the data of the request in the original format;

an access method configured to define an interface to the appropriate one of the plurality of applications; and

a process flow model configured to associate the message formatting rules and the access method instance and comprising mapping rules configured to map input fields of the request in the original format to input fields of the appropriate one of the plurality of applications.

14.   (Withdrawn) A system for handling eCommerce requests, comprising:

(a)   a plurality of applications each configured to process requests in a respective, transformed format, wherein the respective transformed formats are different from one another, wherein each request is received from one of a plurality of requesting entities in an original format and mapped to one of the respective transformed formats;

(b)   at least one specification document for each respective, transformed format configured to produce metadata defining a relationship between data of a request in the original format and data of the request in the transformed format; and

(c)   a flow manager configured to utilize the metadata to map the request in the original format to the request in the transformed format and to call an appropriate one of the plurality of applications according to the transformed format.

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15.   (Withdrawn) The system of claim 14, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol.

16.   (Withdrawn) The system of claim 14, wherein the data of the request in the original format comprises fields and wherein the metadata maps the fields to input fields of an appropriate one of the plurality of applications.

17.   (Withdrawn) The system of claim 14, wherein the at least one specification document comprises:

message formatting rules comprising definitional data and configured to define an association between the definitional data and the data of the request in the original format;

an access method configured to define an interface to an appropriate one of the plurality of applications, dependent on the request; and

a process flow model configured to associate the message formatting rules and the access method instance and comprising mapping rules configured to map input fields of the request in the original format to input fields of the appropriate one of the plurality of applications.

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RELATED PROCEEDINGS APPENDIX

No copies of decisions rendered by a court or the Board in a related appeal or interference are included as there have been no decisions by the court or the Board in a related appeal or interference.

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